

**To:** Johnson, Kathleen[Johnson.Kathleen@epa.gov]; Goforth, Kathleen[Goforth.Kathleen@epa.gov]  
**From:** Gaudario, Abigail  
**Sent:** Mon 5/9/2016 5:57:30 PM  
**Subject:** FW: new review of Rosemont mining hydrology studies concludes recognition of likely risk to Cienega Creek inadequate, not trustworthy  
report 20160506 Review of the Potential Impacts of the Proposed Rosemont Mine PRUCHA FINAL.pdf

**From:** rsilver@biologicaldiversity.org [mailto:rsilver@biologicaldiversity.org]  
**Sent:** Friday, May 06, 2016 12:23 AM  
**To:** Strauss, Alexis <Strauss.Alexis@epa.gov>; Gaudario, Abigail <Gaudario.Abigail@epa.gov>  
**Subject:** new review of Rosemont mining hydrology studies concludes recognition of likely risk to Cienega Creek inadequate, not trustworthy

“...I found a number of issues with model development, including the overall methodology, characterization, conceptualization of flow, model setup/assumptions, calibration of the model and the selection process for selecting an appropriate software modeling tool to meet stated objectives. These issues alone reduce the overall credibility and accuracy of the modeling to such a level that it is difficult to trust major conclusions that the pumping will have only limited impacts on water resources within the LCNCA. Perhaps more importantly, given the high level of uncertainty with increasing distance from the mine, I found the sensitivity analysis, conducted instead of a more appropriate and rigorous industry standard uncertainty analysis, very limited due to the selective choice of which inputs to vary and by how much. In fact, I believe that had they conducted a more formal uncertainty analysis, which considers all sources of uncertainty and the significant model calibration error in the LCNCA, they would have found a much greater range of impacts to water resources within the LCNCA. “

Robin Silver, M.D.

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